



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

SDMS Document



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May 27, 2003

BY TELECOPY & REGULAR MAIL

Michael P. Last, Esq.
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Re: Cornell Dubilier Electronics Superfund Site
South Plainfield, Middlesex County, New Jersey

Dear Michael:

This will respond to your letter dated March 21, 2003 concerning the Remedial Alternatives Screening Technical Memorandum for Operable Unit 2 ("OU2") at the Cornell-Dubilier Electronics ("CDE") Superfund Site.

Your letter identifies several site-specific factors that you believe should be considered as the Feasibility Study ("FS") for OU2 progresses: physical and chemical heterogeneity of on-site soils; limitations of a single remedial technology to address physical and chemical heterogeneities; potential volume of soils to be addressed; and identification of constituents and exposure pathways resulting in exposures exceeding the acceptable risk range. With reference to these factors, among others, you then describe a remedial alternative that Environ has developed at the request of your client, Dana Corporation.

To the extent that you seek to bring to EPA's attention the factors that you have identified, please be assured that these will be considered in the FS, in that they all appear to be encompassed in one or more of the nine evaluation criteria set forth in the National Contingency Plan ("NCP"), which EPA uses to develop and assess potential remedial alternatives for a Superfund Site. For example, the heterogeneity and volume of soils may be relevant to the analysis of the implementability and cost of various alternatives; and issues concerning pathways of exposure would likely be relevant to the analysis of the long-term effectiveness and permanency of each alternative, and may also be relevant to the evaluation of reduction of toxicity, mobility or volume through treatment.

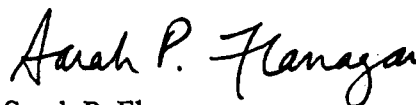
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The remedial alternative that you propose for EPA's consideration consists of three primary elements: defining the limits of soil contamination that could be considered "principal threat" material; treating principal threat materials; and containment of both treated and untreated soils. EPA will take your suggestion into consideration, with the caveat that EPA's evaluation of remedial alternatives is necessarily made with reference to the nine NCP evaluation criteria, and with the ultimate goal of satisfying the Remedial Action Objectives developed for the Site and set forth in the FS.

EPA appreciates your taking the time to share Dana's comments on the remedial alternative selection process as it develops. (Also, please note that EPA will respond under separate cover to the letter from Mark Nielsen to Pete Mannino, dated March 21, 2003 and written on behalf of Dana and Cornell Dubilier Electronics, Inc.) At EPA's next public availability session, where we will present the results to date of the remedial alternatives evaluation, there should be an opportunity for a more detailed technical discussion respecting the issues raised by your letter dated March 21, 2003, and the letter of Mark Nielsen of the same date.

I look forward to seeing you on at the public availability session on June 9, 2003.

Sincerely,



Sarah P. Flanagan
Assistant Regional Counsel

cc: Kim Stollar, Esq.